

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

2007 DEC 28 AM 8:21  
JUDITH A. FAY  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

LOUIS EARL MILES JR.  
PLAINTIFF

VS.

CASE # 2:07-CV-950

MONTGOMERY CITY POLICE  
DEPT. ET AL  
DEFENDANTS

MOTION TO  
INTERROGATION DEFENDANTS

Come's Now The PLAINTIFF Louis Earl Miles JR., By And Through pro-se with, The ABOVE STYLE - CAUSE OF ACTION. Hereby move's This Honorable Court For AN order, ordering DEFENDANTS TO ANSWER ALL INTERROGATION'S QUESTION AS Follow.

Following QUESTION

- (1.) WHAT DATE Did THIS INCIDENT TAKE place?
- (2.) WHAT Time Did you Arrive on the scene?
- (3.) Why Didn't you WAIT For BACKUP?
- (4.) WHAT is The proper proceduAH For A K-9 officer WITH A Dog' when iT come To A BURGLARY CALL?
- (5.) How long HAS you BEEN A police For MONTgomery City police Dept. ?
- (6.) How long HAS you BEEN working AS A K-9 officer?
- (7.) How long HAS you BEEN working WITH your PARTNER ZAK?
- (8.) How MANY Time HAS you BEEN involed' when A INMATE WAS ASSAULTED?
- (9.) How many Time has your partner BITEN A person?
- (10.) How many BITES should A person SUSTAIN

Before you call your partner off?

(11.) If you'll coming out of the BACK Door OF The Business, which side was the Jeep park on?

(12.) If you'll coming out of the BACK Door OF The Business, which side was the crates sitting on?

(13.) Tell Approximately How many feet's was the crates sitting From The BACK Door?

(14.) Tell Approximately How many feet's was the Jeep parked From The BACK Door OF The Business?

(15.) ISNT it True I Louis E. Miles JR. give A voluntarily statement concerning The Dog ATTACK AND The BUNNY charge?

(16.) Do you Think my voluntarily statement is False?

(17.) ISNT it True That NOTHING WAS ACTUALLY Stolen From The Business?

(18.) Do you think my voluntary statement is true?

(19.) Officer W.B. Dickey Do you realize you give several false statement under oath?

(20.) Do you carry a pistol?

(21.) Did you draw your pistol when I exit the business?

(22.) Did you take your pistol out when you seen me walking toward the door with an unknown object in my hand?

(23.) Why was your partner ZAK commanded to attack when you had your pistol drawn on me?

(24.) Isn't it true, that you and ZAK was standing 15 feet to the left from the back door?

(25.) Did I run when I exit the back door?

(26.) Why couldn't I just turn around and go back into the business, since I was exiting

The Business When you started Hollering?

(27.) IS'NT IT TRUE I DROPPED THE BOXES AND LAYED FACE DOWN AND ASKED YOU TO PLEASE DONT RELEASE THAT DOG?

(28.) WHERE DID I LAY DOWN AT?

(29.) WHY ALL THE SCARE FROM THE DOG ATTACK? CLEARLY SHOW THE BITE'S CAME FROM A LAY DOWN POSITION?

(30.) WHY WAS I BITEN OVER 40 TO 50 TIMES ON JUST MY LEFT ARM?

(31.) WHAT THE OFFICER NAME AND ADDRESS THAT PUT THE CUFF'S ON ME, WHILE I WAS LAYING NEXT TO THE BACK DOOR?

(32.) WHY DID YOU KEEP ME ON THE GROUND HANDCUFFED BEHIND MY BACK FOR 26 MINUTE AFTER I BEEN BITEN OVER 40 TO 50 TIMES BY A DOG?

(33.) WHY WASNT THE MEDICS CALLED TIL 1:54 AM WHEN I WAS BITEN AT 1:28 AM?

(34.) DID THE MEDICS ARRIVE AT 2:05 AM?

(35.) WHAT'S THE MEDICS NAME'S AND ADDRESS THAT TREATED ME?

(36.) WOULDN'T YOU SAY BEING BITEN OVER 40 TIMES CLASSIFY AS A CRUEL AND UNUSUAL PUNISHMENT?

(37.) WOULDN'T YOU SAY BEING HELD AT GUN POINT WHILE BEING BITEN OVER 40 TIMES BY YOUR PARTNER, CONSTITUTE EXCESSIVE FORCE?

(38.) WHY WAS I BITEN 40 TO 50 TIMES WHEN YOU HAD A PISTOL DRAWN ON ME?

(39.) WHY WOULD I RUN IF YOU GOT A PISTOL DRAWN ON ME?

(40.) WHY DIDN'T YOU CONCLUDE THE PICTURES THAT WAS TAKEN AT THE SCENE IN YOUR WRITTEN REPORT?

(41.) CAN I HAVE THE PICTURES THAT WAS TAKEN AT THE SCENE?

(42.) WHY DIDN'T YOU CONCLUDE OFFICER J.D. EZZELL #1186 UNIT 150 IN YOUR WRITTEN REPORT?

(43.) IS'NT IT TRUE, OFFICER J. O. FZELL #1186 UNIT 150 IS THE ONE THAT ARRIVE AND PUT MY HAND BEHIND MY BACK AND HANDCUFFED ME, WHILE I WAS BLEEDING HEAVY FROM THE DOG ATTACK?

(44.) DO YOU KNOW I AM CHARGED WITH A THEFT FIRST DEGREE?

(45.) WHY DID YOU SAY I WENT STRAIGHT TO JAIL AFTER LEAVING THE HOSPITAL?

(46.) WHY WAS'NT I BOOKED IN JAIL UNTIL 7:08AM?

Respectfully Submitted This  
The 20<sup>th</sup> day of December, 2007.

Louis E. Mules Jr